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9 UNITED STATES DISTRICT COURT  
10 WESTERN DISTRICT OF WASHINGTON  
11 AT SEATTLE

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 LAMONT JEFFREY REYNOLDS,

16 Defendant.

17 } CASE NO. CR18-131 RAJ

18 } DECLARATION OF LAMONT  
19 } REYNOLDS

20 I, Lamont J. Reynolds, certify and declare as follows:

21 1. I am the defendant in this case. I am incarcerated at the Lompoc Federal  
22 Correctional Institution.

23 2. For the past six weeks at least I have had problems sleeping at night. In  
24 addition to the noise in the dormitory I'm in, I worry a lot about myself and my family  
25 and have a hard time falling asleep. I regularly don't fall asleep until past 3 a.m. I feel  
26 helpless and hopeless about my situation, being in the worst prison in the BOP. I  
27 cannot seem to relax my mind. The lock down conditions are horrible and there is  
28 nothing I can do. You can't escape it as we can't go to the gym or yard and there is  
nothing I can do to relieve my mind from worry.

1       3. It is not just my diagnosis for COVID, but I have seen people fall down  
2 sick in front of me and I have had to help them to get to medical. I saw one person die  
3 on a gurney from what I believe to be COVID in May, and I saw medical trying to  
4 revive him but he was dead, and I saw them put a cover over his face. I was very  
5 scared that could happen to me or anyone of us in here. Even if I was released  
6 tomorrow, I think it will take time to get over everything that has happened to me.

7       4. A few weeks ago, a psychologist came to the dorm and about asked  
8 people about their mental health. I told her about my mental distress and she said she  
9 would try to set up future consultations with us, but that hasn't happened.

10      5. On June 9, 2020,[<sup>1</sup>] I saw Dr. Dhaliwal and he talked to me about my  
11 liver and kidney disease, but all he did was take my blood pressure. I later put in a kite  
12 for someone to do more blood work on me but that was a week ago and nothing has  
13 happened since. I have a hard time communicating with Dr. Dhaliwal because he does  
14 not speak English fluently.

15      6. Last Wednesday, when I was trying to get my medical records at "sick  
16 call," I heard a nurse tell another inmate within listening distance that we should not  
17 put that we are having symptoms of COVID on our sick call forms, even though  
18 people are still testing positive.

19      I certify or declare under penalty of perjury that the foregoing is true and  
20 correct.

21      Dated this 29th day of June 2020, at Lompoc, California.

22      I am unable to sign this document as it was prepared in Seattle, but I have had it  
23 read to me and I am authorizing Neil Fox to sign it on my behalf.

24        
25      Lamont J. Reynolds, by Neil Fox

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28      <sup>1</sup> Note that when I read this back to Mr. Reynolds, I said June 9<sup>th</sup>, but my notes of the  
conversations show that it was actually on June 12th.